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# ANTI-CORRUPTION & ANTI-BRIBERY POLICY

*Integrity • Accountability • Transparency • Zero Tolerance*

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*"AFSEN Africa is committed to the highest standards of ethical conduct, financial integrity, and accountable governance in everything we do."*

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## Foreword from the Board of Directors

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Alliance for Food Security and Nutrition Africa (hereafter known as “AFSEN Africa”) exists to serve communities, drive meaningful change, and uphold the trust placed in us by the people we work with, our donors, and our partners. That trust is not given lightly — it is earned through consistent ethical conduct, transparent governance, and an unwavering commitment to accountability.

Corruption, fraud, and bribery are not abstract risks. They are real threats that divert resources away from the communities who need them most, damage institutional credibility, and undermine the very mission that AFSEN Africa was founded to pursue. We take these threats seriously, and this policy reflects that seriousness.

This Anti-Corruption and Anti-Bribery Policy establishes a clear, comprehensive, and enforceable framework for how AFSEN Africa prevents, detects, and responds to corruption-related risks. It is binding on every person who acts on our behalf — from board members and senior leaders to staff, volunteers, consultants, and partner organizations.

We do not tolerate corruption in any form, at any level, under any circumstance. This is not merely a compliance requirement — it is a reflection of our organizational values and a promise to the communities we serve.

Every individual covered by this policy is expected to read it carefully, ask questions where needed, and uphold its standards in every aspect of their work. Where concerns arise, we expect people to speak up — and we commit to protecting those who do.

**On behalf of the Board of Directors, AFSEN Africa**

*January 2025*

## PART I: PUBLIC POLICY FRAMEWORK

*Part I of this policy is publicly available and applies to all persons associated with AFSEN Africa. It sets out the organization's position, standards, and expectations in relation to corruption, fraud, bribery, and related misconduct.*

### 1 Scope of This Policy

#### 1.1 Who This Policy Applies To

This policy applies to every individual and entity acting on behalf of or in association with AFSEN Africa. Coverage is comprehensive and includes the following categories:

- All permanent, part-time, and temporary staff members employed under any contractual arrangement
- Members of the Board of Directors and any sub-committees or advisory panels
- Volunteers, interns, fellows, and individuals on secondment to AFSEN Africa
- External consultants, contractors, and service providers engaged under formal agreements
- Partner organizations and sub-grantees implementing programs on behalf of AFSEN Africa
- Any individual or organization receiving or managing AFSEN Africa funds

#### 1.2 Geographic and Programmatic Scope

This policy applies to all AFSEN Africa activities, programs, and operations — regardless of geographic location. It covers activities conducted within AFSEN Africa's registered country of operation and all countries or regions where the organization delivers programs, manages funds, or maintains partnerships. No geographic location or cultural context creates an exemption from this policy.

#### 1.3 Public Availability of Part I

Part I of this policy is designed to be transparent and publicly accessible. It is published on AFSEN Africa's official communication channels and is

shared with all relevant persons at the point of induction. Partners and suppliers are provided with a copy as part of their onboarding process. Donors and oversight bodies may request a copy at any time.

## 1.4 Internal Governance Use of Part II

Part II of this policy is designated for internal governance use only. It is restricted to the Board of Directors and Senior Leadership Team and provides detailed procedures for managing allegations, conducting investigations, and implementing corrective actions. Access to Part II is controlled and shared only on a need-to-know basis.

## 1.5 Policy Review and Updates

This policy is reviewed annually by the Board of Directors or more frequently if required by changes in legislation, regulatory requirements, donor conditions, or the operational environment. All updates are documented, version-controlled, and communicated to relevant persons upon adoption.

## 2

## Definitions

### 2.1 Key Terms

The following definitions apply throughout this policy:

Term	Definition
<b>Corruption</b>	The abuse of entrusted power — by any individual in any role — for private gain, whether financial, personal, or reputational.
<b>Fraud</b>	Deliberate and dishonest deception used to secure an unlawful or unfair financial or personal benefit, including falsification of records, claims, or reports.
<b>Bribery</b>	The offering, giving, receiving, or soliciting of anything of value — in cash or kind — to improperly influence the actions, decisions, or judgment of an individual.
<b>Extortion</b>	The use of coercion, threats, or force to obtain money, services, compliance, or other benefits from an individual or organization.

<b>Facilitation Payment</b>	An unofficial or informal payment — however small — made to expedite or secure the performance of a routine government or administrative action. Strictly prohibited.
<b>Theft</b>	The unauthorized and intentional taking of assets, funds, or property belonging to AFSEN Africa or entrusted to its care.
<b>Negligence</b>	A failure to exercise the duty of care expected of a person in their role, resulting in loss, harm, or organizational risk.
<b>Conflict of Interest</b>	A situation — real or perceived — in which personal, financial, or relational interests may improperly influence professional judgment or organizational decisions.
<b>Whistleblower</b>	Any individual who, in good faith, reports a concern about suspected wrongdoing, misconduct, or breach of this policy.
<b>Misconduct</b>	Any behavior that violates AFSEN Africa's policies, codes of conduct, legal obligations, or ethical standards.

## 2.2 Facilitation Payments — Zero Tolerance

AFSEN Africa applies a strict zero-tolerance position to facilitation payments. These are informal payments — sometimes referred to as 'speed money' or 'grease payments' — made to public or private officials to expedite routine actions to which AFSEN Africa is already legally entitled, such as obtaining permits, licenses, customs clearance, or utility connections.

Such payments are prohibited regardless of their size, the frequency with which they may appear to occur in a given country or context, or any claim that they represent accepted local practice. Any request for a facilitation payment must be refused and reported immediately.

### 3

## Zero Tolerance Commitment

### 3.1 Organizational Position

AFSEN Africa maintains an absolute, non-negotiable zero-tolerance position against all forms of corruption, fraud, bribery, and related misconduct. This commitment is embedded at every level of the organization — from the Board of Directors to field volunteers — and applies across all programs, funding streams, partnerships, and geographies.

AFSEN Africa does not view anti-corruption compliance as a bureaucratic obligation. We view it as a fundamental ethical responsibility — to the communities we serve, to our donors and partners, and to the broader development sector.

Our Zero Tolerance Commitment is grounded in four core organizational principles:

- Protecting programmatic resources — ensuring that every dollar, asset, and resource reaches its intended community purpose without diversion or misuse.
- Safeguarding institutional credibility — maintaining the trust of donors, partners, governments, and communities through consistent ethical conduct.
- Promoting accountable governance — ensuring that leadership at all levels models integrity and holds itself to the highest standards.
- Preventing community harm — recognizing that corruption causes direct and lasting harm to the most vulnerable people we exist to serve.

### **3.2 Mandatory Zero-Tolerance Declaration**

All relevant persons — including staff, board members, volunteers, consultants, and long-term contractors — are required to sign AFSEN Africa's Zero-Tolerance Declaration upon joining the organization and annually thereafter as part of the annual performance and compliance review cycle. Signing of the Declaration is a condition of continued engagement with AFSEN Africa.

### **3.3 Enforcement Mechanisms**

AFSEN Africa enforces its zero-tolerance commitment through a layered system of preventive, detective, and responsive measures:

Mechanism	Description
<b>Conduct Standards</b>	Clear, documented behavioral expectations embedded in all contracts and onboarding processes.
<b>Preventive Controls</b>	Internal financial, procurement, and HR controls designed to eliminate opportunities for corrupt conduct.
<b>Reporting Channels</b>	Multiple safe, confidential channels through which concerns can be raised without fear of retaliation.
<b>Investigation Capacity</b>	A structured Fraud and Corruption Response Team with defined roles, authority, and procedures.
<b>Training &amp; Awareness</b>	Mandatory induction and periodic refresher training for all personnel.
<b>Disciplinary Action</b>	Proportionate, timely, and transparent consequences for confirmed violations at any level.
<b>Monitoring &amp; Review</b>	Regular risk assessments, internal audits, and policy reviews to identify and address emerging vulnerabilities.

### 3.4 Consequences of Breach

Any confirmed involvement in corruption, fraud, or bribery — by any individual at any level — will result in disciplinary action. The severity of the response will be proportionate to the nature, seriousness, and circumstances of the breach but will always be decisive. Possible outcomes include:

- Immediate suspension pending a full investigation
- Termination of employment, voluntary agreement, or contractual engagement
- Civil or criminal legal proceedings, including referral to law enforcement authorities
- Recovery and full restitution of any funds misused, misappropriated, or unlawfully obtained
- Reporting to relevant donors, regulatory bodies, and oversight authorities
- Permanent exclusion from future engagement with AFSEN Africa

## 4 Anti-Bribery Standards

### 4.1 General Prohibition

AFSEN Africa prohibits all forms of bribery in every context — whether direct or indirect, active or passive, actual or attempted. No individual acting on behalf of AFSEN Africa shall, at any time:

- Offer, promise, or give any bribe, payment, gift, or benefit to any person
- Request, agree to receive, or accept any bribe, payment, gift, or benefit
- Authorize, facilitate, or encourage another person to engage in bribery on AFSEN Africa's behalf
- Fail to report a known or reasonably suspected instance of bribery

### 4.2 Scope of the Prohibition

The prohibition on bribery applies equally to interactions with public officials, government agencies, private sector entities, other NGOs, partner organizations, and individuals. It applies regardless of whether the bribe is offered in cash, in kind, as a favor, or in any other form of benefit. It applies whether the intended beneficiary is the individual themselves or a third party.

### 4.3 No Delegated Authority for Bribery

No person — at any level of AFSEN Africa — holds delegated authority to approve, permit, or sanction bribery. Such authority does not exist within the organization. Any instruction to engage in bribery — regardless of the seniority of the person giving the instruction — must be refused and reported immediately.

### 4.4 Exceptional Circumstances

In rare and documented exceptional situations where a controlled financial decision is considered unavoidable and all lawful alternatives have been exhausted, only the full Board of Directors may authorize an exceptional and strictly controlled response. Any such authorization must:

- Be formally documented before or immediately following the event
- Include a written justification setting out why all alternatives were exhausted
- Include a full risk assessment and assessment of legal implications

- Be transparently recorded in AFSEN Africa's financial management and audit systems
- Be reported to relevant donors, oversight bodies, or regulatory authorities as required

#### **4.5 Payments Made Under Threat or Coercion**

Where any individual is compelled to make a payment under direct threat of physical harm, violence, or serious unlawful coercion, the payment is classified as extortion — not bribery. In such situations, the personal safety of the individual takes absolute precedence. The incident must be reported to the designated FCRT focal person at the earliest safe opportunity. AFSEN Africa will support the affected individual throughout the reporting and recovery process.

## **5 Conflicts of Interest**

### **5.1 Definition and Scope**

A conflict of interest arises whenever a personal, financial, familial, or relational interest — whether actual, potential, or perceived — may influence, or reasonably appear to influence, an individual's professional judgment, decisions, recommendations, or actions in their role at AFSEN Africa.

The existence of a conflict of interest does not automatically imply wrongdoing. However, undisclosed or unmanaged conflicts represent a serious risk to organizational integrity and are treated as a breach of this policy.

### **5.2 Policy Objective**

AFSEN Africa's policy is to ensure that all conflicts of interest — real, potential, or perceived — are identified early, disclosed promptly, assessed transparently, and managed appropriately. The objective is not to punish the existence of conflicts, but to ensure that decisions and processes are free from improper influence and that AFSEN Africa's resources and reputation are protected.

### **5.3 Common Examples of Conflicts of Interest**

- A staff member involved in procurement who has a family member employed by or owning a competing supplier
- A board member who holds a financial interest in an organization applying for a grant or partnership with AFSEN Africa

- A line manager who is responsible for evaluating the performance of a close personal friend or romantic partner
- A recruitment panel member who has a prior personal or professional relationship with one of the candidates
- A finance officer who approves payments to a company in which they or a family member holds a stake
- A senior leader who receives gifts, hospitality, or personal benefits from a supplier or partner organization

#### **5.4 Declaration Requirements**

The following personnel are required to submit a completed Conflict of Interest Declaration Form on an annual basis, no later than 31 January each year:

- All members of the Board of Directors and any appointed sub-committees
- All members of the Senior Leadership Team
- All finance, procurement, grants management, and HR personnel

All other staff, volunteers, and contractors are required to declare any conflict of interest immediately upon becoming aware of it. Declarations are submitted to the designated HR or Governance focal person and are maintained in a confidential register.

#### **5.5 Managing Declared Conflicts**

The appropriate management of a declared conflict will be determined on a case-by-case basis, proportionate to the nature and severity of the risk. Management measures may include one or more of the following:

- Formal exclusion from the relevant decision-making process, approval, evaluation, or vote
- Reassignment of responsibilities to remove the source of the conflict
- Increased oversight, dual-authorization requirements, or independent review of decisions
- Resignation from a conflicting role, committee, or external position
- In serious cases, removal from post where no other management option is adequate

## **6**

## **Gifts, Hospitality & Benefits**

## **6.1 Guiding Ethical Principle**

AFSEN Africa recognizes that gifts and hospitality are a normal part of professional and cultural life in many contexts. However, when accepted without appropriate controls, they can — or can be perceived to — compromise the independence, impartiality, and integrity of individuals and of the organization as a whole. The guiding principle is simple: no gift, hospitality, or benefit should influence — or appear to influence — professional judgment or organizational decisions.

## **6.2 When Gifts and Hospitality May Be Acceptable**

In limited and transparent circumstances, modest gifts or hospitality may be considered acceptable where they satisfy all of the following conditions simultaneously:

- They are modest in value and proportionate to the professional relationship
- They are culturally appropriate and consistent with local norms and expectations
- They are received openly, without secrecy, and could withstand public scrutiny
- They are not connected — directly or indirectly — to any procurement, recruitment, grant, or decision-making process
- They do not create an actual or perceived sense of obligation, reciprocity, or preferential treatment
- They are declared to a line manager or designated authority and recorded in the gifts register

## **6.3 Strictly Prohibited Gifts and Benefits**

The following types of gifts, benefits, and hospitality are strictly prohibited under all circumstances, without exception:

- Cash payments of any amount, or cash-equivalent benefits such as gift vouchers, gift cards, store credits, or cryptocurrency
- Gifts with a value exceeding the threshold defined in AFSEN Africa's internal finance and procurement guidelines
- Any gift or benefit offered or received during, immediately before, or after a procurement process, tender evaluation, or grant decision
- Gambling-related entertainment, invitations to events with gambling components, or any related benefit
- Gifts or benefits intended — explicitly or implicitly — to influence a decision, secure a contract, or gain preferential treatment

- Gifts accepted on behalf of family members or associates that are linked to the recipient's professional role

## 6.4 Seeking Approval

Where any uncertainty exists about the appropriateness of a gift or hospitality — whether to accept or to offer — the individual must seek written approval from their line manager or a designated senior authority before proceeding. The general principle is: when in doubt, decline.

## 6.5 Handling Inappropriate Gifts

- Decline the gift at the point of offer wherever possible, explaining AFSEN Africa's policy in a respectful and professional manner
- If the gift has already been received before its inappropriateness was recognized, return it promptly with a written explanation
- Report the incident to a line manager or designated focal person without delay
- Ensure the incident is recorded in the organization's gifts and hospitality register

# 7 Speaking Up & Reporting Concerns

## 7.1 A Culture of Openness and Safety

AFSEN Africa is committed to building and sustaining an organizational culture where every individual feels genuinely safe, supported, and empowered to raise concerns about corruption, fraud, bribery, or any other form of unethical behavior — without fear of retaliation, marginalization, or negative professional consequences.

Speaking up is not only a right — it is a professional and ethical responsibility. Early reporting of concerns allows AFSEN Africa to respond quickly, limit harm, and protect both the organization and the communities it serves.

## 7.2 What Constitutes a Genuine Concern

A genuine concern is any report made honestly and in good faith, based on a reasonable belief or suspicion of wrongdoing. Individuals are not required to have gathered conclusive evidence or to be certain that misconduct has occurred before raising a concern. Reasonable suspicion, based on observed facts or information, is sufficient grounds to report.

### 7.3 Reporting Channels

- Designated Internal Focal Person — the appointed Anti-Corruption Lead within AFSEN Africa
- Official Confidential Reporting Email — a monitored, dedicated email address accessible to all personnel
- Anonymous Reporting Mechanism — available where technically feasible
- Direct Reporting to the Board of Directors — for concerns involving senior leadership or where the internal channel is perceived to be compromised
- Donor or Regulatory Reporting — individuals retain the right to report concerns directly to relevant donors or oversight bodies

### 7.4 False and Malicious Reporting

Deliberately false, malicious, or vexatious reporting — including reports made with the intention of harming an individual's reputation without genuine grounds — is a serious breach of this policy and will be subject to disciplinary action. This provision does not deter genuine good-faith reporting, even where the concern ultimately proves to be unfounded.

### 7.5 Response Timelines and Communication

- All reports will be formally acknowledged within 24 hours of receipt where possible
- The reporting person will be kept informed of the status of their concern at agreed and regular intervals
- Upon conclusion of the investigation, the reporting person will be informed of the outcome
- Where a concern cannot be fully investigated, this will be explained to the reporter

## 8

## Protection of Reporting Persons

### 8.1 Non-Retaliation Commitment

AFSEN Africa expressly and unconditionally prohibits any form of retaliation — direct, indirect, overt, or subtle — against any individual who raises a concern, participates in an investigation, provides testimony or evidence, or takes any action in good faith under this policy. Retaliation against a

reporting person is itself a serious disciplinary offense, regardless of the outcome of the original concern.

## **8.2 Forms of Prohibited Retaliation**

- Dismissal, demotion, reduction in grade, or other adverse changes to employment terms
- Removal of responsibilities, exclusion from opportunities, or denial of career development
- Harassment, intimidation, bullying, or hostile treatment in the workplace
- Deliberate isolation, exclusion from teams, or withholding of information
- Threats — explicit or implied — aimed at discouraging disclosure or punishing the act of reporting
- Any other action that disadvantages the individual as a result of their good-faith report

## **8.3 Support Mechanisms for Reporting Persons**

- Strict protection of the reporter's identity throughout and after the investigation process
- Access to a confidential, designated support focal person who can provide guidance and pastoral support
- Active monitoring of the reporter's working environment to detect and prevent any form of retaliation
- Regular, clear communication on the progress and outcome of their reported concern
- Access to any additional legal, welfare, or psychological support deemed appropriate
- The right to escalate a retaliation concern to the Board of Directors if not addressed adequately through normal channels

## PART II: INTERNAL RESPONSE & GOVERNANCE FRAMEWORK

*This section is designated for internal governance use only and is restricted to the Board of Directors and Senior Leadership Team. It sets out structured procedures for receiving allegations, forming response teams, conducting investigations, and implementing corrective actions.*

### 9

## Fraud & Corruption Response Team (FCRT)

### 9.1 Purpose and Activation

The Fraud and Corruption Response Team (FCRT) is AFSEN Africa's primary internal body for managing corruption-related allegations. Upon receipt of any substantive allegation, the FCRT is formally activated by the Board Chair or a designated senior authority. The FCRT takes lead responsibility for coordinating the organizational response from initial receipt of the allegation through to resolution and corrective action.

### 9.2 Composition and Independence

The FCRT shall consist of three impartial, senior members drawn from the Senior Leadership Team or Board of Directors. Composition must ensure independence and avoid conflicts of interest. The following individuals are ineligible to serve on the FCRT in relation to a specific investigation:

- Any person named in or directly associated with the allegation
- Any person who has a personal, financial, or relational conflict of interest in the matter
- Any person who is in a direct line management relationship with the subject of the investigation

Where senior leadership is implicated, or where the Board determines internal independence cannot be assured, an independent external investigator shall be appointed.

### 9.3 Core Responsibilities of the FCRT

- Formally receiving, acknowledging, and securely logging all incoming allegations
- Maintaining strict confidentiality of all information and identities throughout the process

- Conducting a preliminary assessment to determine the nature, credibility, and scope of the allegation
- Deciding whether to commission a full internal or external investigation
- Coordinating and overseeing all investigation activities and evidence handling
- Communicating with relevant internal and external stakeholders in a timely and appropriate manner
- Protecting organizational assets, systems, and information from interference or destruction
- Presenting investigation findings and recommendations to the Board for decision

## 10 Donor & External Reporting Obligations

### 10.1 Accountability Commitment

AFSEN Africa is committed to full and timely transparency with donors, funders, and oversight bodies in relation to any confirmed or credibly suspected misuse of organizational or donor funds. This commitment is upheld regardless of the materiality or monetary value of the incident, and irrespective of whether the incident has been fully investigated at the time of reporting.

### 10.2 Principles of Donor Communication

All communications with donors and external stakeholders regarding corruption-related matters must adhere to the following principles:

- Accuracy — all communications must be factually grounded and reflect only confirmed or credibly suspected information
- Timeliness — initial notification must be made as soon as reasonable certainty is established, without undue delay
- Confidentiality — communications must protect the identities of individuals
- Transparency — clear, honest, and regular updates on the investigation process, findings, and outcomes
- Compliance — all communications must meet the reporting obligations set out in donor agreements and applicable regulatory requirements

## 10.3 Regulatory and Legal Reporting

Where an investigation reveals conduct that may constitute a criminal offense under applicable law, AFSEN Africa will cooperate fully with relevant law enforcement and regulatory authorities. The Board of Directors will seek independent legal advice to determine the appropriate scope and timing of any mandatory regulatory disclosures.

# 11 Investigation Procedures

## 11.1 Purpose of Investigations

The purpose of any formal investigation under this policy is to establish facts objectively and without bias, determine whether misconduct or a policy breach has occurred, identify individuals responsible where misconduct is confirmed, assess the extent of any organizational harm or loss, and provide a sound factual basis for proportionate corrective action.

## 11.2 Guiding Principles

All investigations conducted under this policy must adhere to the following principles:

- Fairness and impartiality — all individuals are presumed innocent until facts are established through evidence.
- Evidence-based — conclusions must be grounded in documented, verifiable, and properly handled evidence.
- Confidentiality — information is shared strictly on a need-to-know basis throughout the process.
- Proportionality — the scope, intensity, and resources of the investigation are matched to the severity and complexity of the allegation.
- Timeliness — investigations are completed within a defined and reasonable timeline, with minimum disruption to operations.
- Independence — investigators must be free from conflicts of interest and external pressure.

## 11.3 Preliminary Assessment

Upon activation, the FCRT will conduct a preliminary assessment to determine whether the allegation warrants a full investigation. The assessment will consider the credibility and specificity of the allegation, the seniority of the individuals involved, potential risk to organizational assets or reputation, and any immediate protective or containment measures required.

#### **11.4 Internal vs. External Investigations**

The FCRT will determine whether the investigation is conducted internally or by an independent external investigator. External investigations are preferred and recommended where:

- Members of senior leadership or the board are subjects of the investigation
- The allegation involves systemic or widespread misconduct
- Internal independence and impartiality cannot be adequately assured
- The donor or regulatory authority requires an independent investigation

#### **11.5 Evidence Collection and Handling**

- All documentary and digital evidence is secured, logged, and stored under controlled access
- A clear chain of custody is maintained for all physical and digital evidence
- No evidence is altered, destroyed, or removed from AFSEN Africa's custody without explicit authorization from the FCRT
- Electronic evidence including emails, financial records, and system logs are preserved in their original format
- Evidence is retained for a minimum period consistent with AFSEN Africa's records management and donor reporting obligations

#### **11.6 Rights of Individuals Under Investigation**

- The right to be informed of the nature of the allegation against them at an appropriate stage
- The right to respond fully to allegations and findings before any final disciplinary decisions are made
- The right to be accompanied by a colleague or representative during formal investigative interviews
- Protection from coercion, undue pressure, or intimidation during the investigation process

- The right to access the investigation report and findings at an appropriate stage, subject to confidentiality obligations

## 12 Outcomes & Corrective Actions

### 12.1 Decision-Making Authority

Upon completion of any investigation, the FCRT will prepare a full written report of findings and recommendations for consideration by the Board of Directors or an authorized senior governance body. The Board is responsible for making final decisions on corrective actions, which must be proportionate to the severity and nature of the confirmed breach.

### 12.2 Range of Corrective Actions

- Formal disciplinary procedures including written warnings, suspension with or without pay, or termination of employment or contract
- Civil legal proceedings for recovery and restitution of misused or misappropriated funds
- Referral to law enforcement or regulatory authorities for criminal investigation and prosecution
- Mandatory remedial training and compliance measures for individuals or teams where systemic failures are identified
- Strengthening of internal controls, financial systems, or governance procedures to prevent recurrence
- Reporting to donors, funders, or oversight bodies as required by grant conditions or regulatory obligations
- Staff restructuring, role redesign, or organizational change where systemic failure or institutional risk is identified

### 12.3 Lessons Learned and Institutional Improvement

Following the conclusion of any significant investigation, the FCRT will lead a lessons-learned review to identify systemic weaknesses, control gaps, or process failures that may have enabled or facilitated the misconduct. Findings from this review will be incorporated into AFSEN Africa's risk management framework, internal audit plan, and policy review cycle.

## 13 Training & Awareness

### 13.1 Mandatory Training Requirements

Anti-corruption training is mandatory for all AFSEN Africa personnel. No individual shall undertake their role without first completing the required training. Training covers the following areas:

- The content, purpose, and requirements of this Anti-Corruption and Anti-Bribery Policy
- How to recognize and respond to corruption, fraud, bribery, and conflicts of interest in day-to-day work
- Available reporting channels, whistleblower protections, and the FCRT process
- Gifts, hospitality, and benefit acceptance standards and declaration procedures
- AFSEN Africa's organizational values, ethics framework, and code of conduct

### 13.2 Refresher Training and Compliance Records

Anti-corruption training shall be refreshed at intervals of no more than two years for all personnel. More frequent refreshers will be scheduled where the risk environment changes, the policy is updated, new programmatic risks are identified, or a significant corruption incident has occurred. Completion of all mandatory training is recorded in personnel files and forms part of the annual compliance review.

### 13.3 Partner and Supplier Training

Where AFSEN Africa determines that a partner organization or supplier presents a significant corruption risk, it may require the relevant personnel to complete AFSEN Africa's anti-corruption training or to demonstrate equivalent training through their own organization's program. This requirement will be specified in the relevant partnership or supplier agreement.

## 14 Disciplinary Measures

### 14.1 Enforcement

All violations of this policy will be addressed through AFSEN Africa's formal disciplinary process in accordance with applicable HR policies, employment agreements, and contractual terms. Disciplinary processes will be conducted fairly, transparently, and in compliance with applicable labor law and natural

justice principles. All disciplinary actions will be formally documented and retained on the relevant personnel file.

## 14.2 Graduated Disciplinary Outcomes

- Formal written warning, recorded on the individual's personnel file, with mandatory remedial training
- Final written warning, specifying conditions for continued employment or engagement
- Suspension with or without pay pending the conclusion of an investigation or disciplinary process
- Termination of employment, consultancy agreement, volunteer arrangement, or partnership agreement
- Civil legal action for recovery of funds, assets, or losses arising from the breach
- Referral to police or relevant law enforcement authorities for criminal investigation

## 14.3 Right of Appeal

Any individual subject to a disciplinary outcome under this policy retains the right to appeal the decision in accordance with AFSEN Africa's HR policies and applicable employment law. Appeals must be submitted in writing within the timeframe specified in the disciplinary outcome notice. Appeals will be heard by a panel that has had no prior involvement in the original investigation or disciplinary decision.

# 15 Contracts & Partner Agreements

## 15.1 Employment Contracts

All employment contracts issued by AFSEN Africa must include explicit and binding clauses that:

- Require compliance with this Anti-Corruption and Anti-Bribery Policy as a condition of employment
- Specify the consequences of confirmed policy violations, including termination
- Establish the obligation to declare conflicts of interest and to report corruption-related concerns
- Confirm that the individual has read, understood, and agrees to abide by the policy

## **15.2 Supplier and Service Provider Agreements**

All agreements with suppliers and service providers must include contractual commitments to:

- Conduct business ethically and in full compliance with applicable anti-bribery and anti-corruption laws
- Declare the absence of any bribery, inducement, or corrupt practice in the procurement or contracting process
- Report any known or suspected corruption or fraud immediately to AFSEN Africa
- Accept AFSEN Africa's right to terminate the agreement in the event of confirmed corruption or bribery
- Submit to audit or review of records where AFSEN Africa or its donors have reasonable grounds to suspect misconduct

## **15.3 Partner Organization and Sub-Grantee Agreements**

Organizations implementing programs or managing funds on behalf of AFSEN Africa must contractually commit to the following:

- Immediate reporting of any suspected or confirmed fraud, corruption, or misuse of funds
- Full financial accountability for AFSEN Africa-managed funds, including repayment of any misused amounts
- Maintenance of transparent, auditable financial systems and records accessible to AFSEN Africa and its donors
- Compliance with this policy and all applicable donor anti-corruption conditions and requirements
- Passing equivalent anti-corruption requirements down to any sub-partners or implementing agents

## Policy Sign-Off & Approval Record

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This policy has been reviewed and approved by the Board of Directors of AFSEN Africa. It supersedes any previous version of the organization’s anti-corruption or anti-bribery policy and takes effect from the date shown below. Document Reference: AFSEN/POL/01.

Role	Name & Signature	Date
<b>Board Chair</b>	_____	_____
<b>Executive Director</b>	_____	_____
<b>Board Secretary</b>	_____	_____

*AFSEN Africa • AFSEN/POL/01 — Anti-Corruption & Anti-Bribery Policy • 2025*

*Integrity • Accountability • Transparency • Zero Tolerance*